UNITED STATES DISTRICT COURT CLER SOUTHERN DISTRICT OF OHIO EASTERN DIVISION 2023 AP

UNITED STATES OF AMERICA

Plaintiff,

v.

TERRAEL A. ALLS, A/K/A "RELL," A/K/A "ACE"

Defendant.

CASE NO.

JUDGE

INDICTMENT

18 U.S.C. §§ 1591(a)(1) & (b)(1)

THE GRAND JURY CHARGES:

COUNT ONE

(Sex Trafficking by Force, Fraud, or Coercion)

1. From in or about May 2021 and continuing through in or about July 2021, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, and elsewhere, the defendant, **TERRAEL A. ALLS a/k/a "RELL" a/k/a "ACE"**, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, and solicit by any means, Victim #1, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and a combination of such means, would be used to cause Victim #1 to engage in a commercial sex act.

In violation of 18 U.S.C §§ 1591(a)(1) & (b)(1).

COUNT TWO

(Sex Trafficking by Force, Fraud, or Coercion)

2. From in or about November 2021 and continuing through in or about April 2022, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, and elsewhere, the defendant, **TERRAEL A. ALLS a/k/a "RELL" a/k/a "ACE"**, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, and solicit by any means, Victim #2, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and a combination of such means, would be used to cause Victim #2 to engage in a commercial sex act.

In violation of 18 U.S.C §§ 1591(a)(1) & (b)(1).

COUNT THREE

(Sex Trafficking by Force, Fraud, or Coercion)

3. From in or about April 2022 and continuing through in or about May 2022, the exact dates being unknown to the Grand Jury, in the Southern District of Ohio, and elsewhere, the defendant, **TERRAEL A. ALLS a/k/a "RELL" a/k/a "ACE"**, did knowingly, in and affecting interstate commerce, recruit, entice, harbor, transport, provide, obtain, maintain, and solicit by any means, Victim #3, a person known to the Grand Jury, knowing and in reckless disregard of the fact that means of force, threats of force, fraud, coercion, and a combination of such means, would be used to cause Victim #3 to engage in a commercial sex act.

In violation of 18 U.S.C §§ 1591(a)(1) & (b)(1).

A TRUE BILL.

s/Foreperson

GRAND JURY FOREPERSON

KENNETH L. PARKER

UNITED STATES ATTØRNEY

EMILY CZERNIEJEWSKI (IL 6308829)

Assistant United States Attorney

JENNIFER M. RAUSCH (0075138)

Assistant United States Attorney